

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

JANE DOE,

Plaintiff

V.

AETNA LIFE INSURANCE COMPANY,
AND BANK OF AMERICA CORPORATION
LONG TERM DISABILITY PLAN,

Defendants

CIVIL ACTION NO.

**PLAINTIFF'S MOTION FOR LEAVE TO PROCEED UNDER A PSEUDONYM AND
TO IMPOUND THE RECORD OF THE PROCEEDINGS**

This Motion is submitted in support of the Plaintiff, Jane Doe's request: (1) for an order granting leave to proceed with her complaint under a pseudonym; and (2) for an order directing the Clerk to seal and impound the complaint filed with this Court, the Plaintiff's affidavit submitted in support of this motion, and all subsequent documents containing any medical and/or identifying information associated with this proceeding. In support of her Motion, the Plaintiff states that this suit, in which Plaintiff seeks recovery of disability benefits owed to her under a long term disability insurance plan, concerns the Plaintiff's medical condition, including her combined physical and mental health diagnoses. These issues reach into the utmost private areas of the Plaintiff's life and are at the cornerstone of the dispute in this case. Public disclosure of the Plaintiff's name and the pleadings and proceedings in this action, would have a severe, damaging impact on the Plaintiff and her ongoing recovery, and will negatively impact the Plaintiff's ability to return to work, as is her current goal. As set forth below, numerous other courts have

permitted plaintiffs to use a pseudonym and to seal the proceedings under comparable circumstances.

An affidavit executed by the Plaintiff providing her true name and the facts of this matter has been filed herewith. *See* Exhibit A to the Plaintiff's Memorandum in Support of her Motion to Under a Pseudonym and to Impound the Record of the Proceedings. No prejudice to the Defendants can arise from proceeding under a pseudonym.

WHEREFORE, the Plaintiff respectfully requests that this Motion be granted.

Date: December 23, 2014

Respectfully submitted,

Jane Doe
By her attorney,

A handwritten signature in black ink, appearing to read 'Mala Rafik', is written over a horizontal line.

Mala M. Rafik
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